

## UNITED STATES DISTRICT COURT

for the  
Southern District of OhioUnited States of America  
v.Joshua R. SADLER  
69 Rodgers Ave.  
Columbus, OH 43222

Case No. 2:23-mj-206

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Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 2021 - January 30, 2023 in the county of Franklin in the  
Southern District of Ohio, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. 2252(a) and 2252A(a)

Distribution, Receipt, and Possession of child pornography/visual depictions  
of minors engaged in sexually explicit activity

This criminal complaint is based on these facts:

See attached affidavit incorporated herein by reference

☒ Continued on the attached sheet.

ANNA S EDGAR

Digitally signed by ANNA S  
EDGAR

Date: 2023.03.28 16:46:19 -04'C

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Complainant's signature

HSI SA Anna Edgar

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Printed name and title

Sworn to before me and signed in my presence.

Date: March 29, 2023City and state: Columbus, OhioKimberly A. Johnson  
United States Magistrate Judge

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**In the Matter of:**

**United States of America**

**v.**

**Joshua R. SADLER**

**69 Rodgers Ave.**

**Columbus, OH 43222**

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**Case No.:** 2:23-mj-206

**Magistrate Judge**

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Anna Edgar, a Special Agent with Homeland Security Investigations, being duly sworn, depose and state as follows:

**INTRODUCTION**

1. Your affiant, assigned to the HSI Office of the Assistant Special Agent in Charge (ASAC) in Columbus, Ohio, makes this affidavit in support of a criminal complaint to arrest Joshua R. Sadler for a violation of Title 18 United States Code (U.S.C.) Sections (§§) 2252 and 2252A –receipt, and/or possession of child pornography. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that SADLER committed the violation listed above.

2. Your affiant has been employed by HSI since January 2010. Your affiant gained experience through completion of the Federal Criminal Investigator Training Program (CITP) and completion of the Immigration and Customs Enforcement Special Agent Training (ICESAT) program. Your affiant's primary duties are and have been the investigation of violations of Titles 8, 18, 19, and 21 of the United States Code. Your affiant has received specialized training and has experience in the above areas. Your affiant has completed numerous applications for criminal complaints, summonses, and search warrants. Your affiant has been assigned to the Franklin County Internet Crimes Against Children (ICAC) Task Force since 2019, where she has conducted and assisted with investigations involving child exploitation and child sexual abuse.

3. The information set forth in this affidavit is based upon evidence that has been gathered and your affiant's observations and experiences, as well as those of co-workers and other law enforcement officers.

### **FACTS SUPPORTING PROBABLE CAUSE**

4. In April 2022, your affiant received information pertaining to an individual by the name of Joshua R. SADLER who was believed to have uploaded child pornography online after having sustained a previous conviction for a crime against a minor child. SADLER was currently residing in Columbus, Ohio. Your affiant subsequently obtained reports from the NCMEC and Franklin County regarding the current and previous investigation of SADLER that had been conducted thus far.

5. On or about December 12, 2021, a CyberTipline report was submitted to the National Center for Exploited Children (NCMEC) by Twitter, Inc. regarding the uploading of child pornography to the Twitter account with Screen/Username "Lucas18696928" with a registered email address of lucasscott2281989@gmail.com. According to the information that was provided by Twitter, on December 12, 2021, two files depicting child pornography were possessed/manufactured/distributed via the "Lucas18696928" Twitter account. The CyberTipline report indicated both files were identified using the MD5 hash matching method<sup>1</sup>. Copies of the child pornography files were included with the CyberTipline report along with information pertaining to the IP address utilized to access the account at the time the suspect files were transmitted. In addition, Twitter provided the NCMEC with the Twitter account description for the "Lucas18696928" account which read "I'm 32 Bisexual I love everything DMs open to all."

6. The investigation revealed the IP address used to upload the child sexual abuse material was geolocated to Columbus, Ohio. More specifically, the IP address 74.141.166.208

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<sup>1</sup> A hash value is "an algorithmic calculation that yields an alphanumeric value for a file." *United States v. Stevenson*, 727 F.3d 826, 828 (8<sup>th</sup> Cir. 2013). Hash values have been referred to as a "unique digital fingerprint," *United States v. Sosa-Pintor*, 741 Fed. Appx. 207 (5<sup>th</sup> Cir. 2018), and are "regularly used to compare the contents of two files against each other." *United States v. Reddick*, 900 F.3d 636, 637 (5<sup>th</sup> Cir. 2018). Because only two identical files will return the same hash value, both law enforcement and private cloud storage companies use hash matching to identify and attempt to thwart the spread of child pornography material on the internet. *Id.* at 637-638.

resolved to the internet service provider Spectrum with a subscriber name of Joshua SADLER at the address of 69 Rodgers Avenue in Columbus, Ohio.

7. On or about January 12, 2022, a second CyberTipline report was submitted to the NCMEC by Kik Messenger services regarding the uploading of child pornography to the Kik account associated with username “intoeverything228198”. According to the information provided by Kik, on or about December 31, 2021, twelve files depicting child sexual abuse material were transmitted over the Kik messenger servers via the target Kik account. The CyberTipLine report indicated eleven of the twelve files were identified using the MD5 hash matching method again. Copies of the uploaded files were included with the CyberTipLine report along with information pertaining to the IP address utilized to access the account at the time the suspect files were transmitted and a registered email for the Kik account, which was joshrrscott228@gmail.com. A summary of some of those images is as follows:

- One image titled 232f7094-ccdf-4d98-9e3b-be5c20533648.jpg depicting a prepubescent female child, positioned on her knees and elbows, with an adult male erect penis inserted into her anal cavity.
- One image titled 21a251cb-22fc-43d6-8bbd-27db78aef76e.jpg depicting a prepubescent female, laying on her back naked with black stockings and white high heels on, with an adult male penis inserted into her vagina.
- One image titled 998c21e6-c06d-4a0d-8189-d9591dcc3b0b.jpg depicting a nude prepubescent female on a bed, using her own arms to spread apart her legs, exposing her nude vagina to the camera which appears to be covered in a white unknown substance.

8. The investigation revealed the IP address used to upload the child sexual abuse material on Kik, 74.141.166.208, was the same one noted above from the NCMEC report submitted by Twitter, which returned again to Joshua SADLER at the address of 69 Rodgers Avenue in Columbus, Ohio.

9. In addition, Twitter provided account content with the NCMEC Cybertip they submitted including a conversation occurring on or about October 16, 2021 between SADLER and another Twitter user. In that conversation, SADLER asked the other user “how young do you like” and indicated his Wickr mobile application name was “intoeverything8” which was similar to the username he utilized via Kik.

10. Legal process was served to Google, Inc. as it pertained to the two Gmail accounts utilized by SADLER noted above: lucasscott2281989@gmail.com and joshscott228@gmail.com. Return results further verified Joshua SADLER as the subscriber and user of those accounts.

11. In further investigation into SADLER, your affiant learned via an open-source search on the Ohio sex offender registry and Franklin County criminal docket that Joshua D. SADLER was a Tier II registered sex offender and had listed his residence as 69 Rodgers Avenue in Columbus, Ohio. More specifically, SADLER had been convicted of two counts of Gross Sexual Imposition, in violation of Ohio Revised Code Section 2907.05 under case number 12CR1225 on August 29, 2012. The background information pertaining to that case revealed SADLER had some form of sexual contact with three minor females and that those minor females ranged from nine years to twelve years of age. On October 23, 2012, he was sentenced to one year imprisonment on each count to be served concurrent with each other. The defendant was also ordered to register as a Tier II sex offender for 25-years.

12. On January 30, 2023, a Franklin County search warrant was obtained for the residence of SADLER at 69 Rodgers Avenue in Columbus, Ohio. That search warrant was executed on January 31, 2023 and when law enforcement arrived on scene, SADLER was present at the address. SADLER made preliminary admissions to having a cell phone in his bedroom. At that point, law enforcement advised SADLER of his *Miranda* rights which he waived, making admissions he looked up child porn and he had been looking at child pornography for the last year. He also indicated his preference for age groups in viewing child sexual abuse material was “2-14, 15-year-old girls.” SADLER admitted he had actually been looking at child pornography for a few years and there would be child sexual abuse material on his tablet in his residence.

13. A total of eight digital media devices were seized from SADLER’s residence including numerous cell phones, to include a Samsung SM-A102U cellular phone and Samsung SM-S515DL cellular phone, a Hitachi hard drive, a Seagate hard drive for a desktop, and an Android tablet model.

14. A forensic review of the Samsung Galaxy SM-S515DL revealed approximately seventeen images and sixty videos depicting child sexual abuse material. This content generally depicted prepubescent and pubescent aged females engaged in the lascivious exhibition of their

genitalia, masturbation, sex acts with adult males including oral to genital and vaginal to genital penetration and sex acts with other minor children. The search history on this device also revealed SADLER had searched for child sex stories titled “raping a little girl in the park, pre-teen stories, my horny little 11-year-old foster girl, incest stories, fucking my little granddaughter, and foster father having fun with kids.” One of the videos recovered from this device titled VID-20200624-WA0326.mp4 depicted, a young, naked, female, prepubescent toddler laying on her back with an adult erect penis near her vagina. The video depicts the adult male forcing the toddler to perform oral sex on his penis and subsequently inserting his penis into her vagina. The male was then observed placing his mouth on the vagina and anus of the female toddler before reinserting his penis into her vagina.

15. Additional child sexual abuse material was also located on the Samsung SM-A102U and Hitachi hard drive recovered as noted above. Approximately 70 images total containing child sexual abuse material were recovered from these devices which generally depicted prepubescent and pubescent aged females engaged in the lascivious exhibition of their genitalia, bestiality, masturbation, sex acts with adult males including oral to genital and vaginal to genital penetration and sex acts with other minor children.

16. Based upon the above information, your affiant submits that there is probable cause to believe that Joshua R. SADLER has committed offenses in violation of 18 U.S.C. Sections 2252 and 2252A – the distribution, receipt, and possession of child pornography. Therefore, your affiant respectfully requests this court issue a criminal complaint and arrest warrant.

**ANNA S  
EDGAR** Digitally signed by  
ANNA S EDGAR  
Date: 2023.03.28  
16:45:01 -04'00'

Anna Edgar  
Special Agent  
Homeland Security Investigations

SWORN AND SUBSCRIBED TO BEFORE ME THIS 29th DAY of March, 2023.

  
Kimberly A. Johnson  
United States Magistrate Judge

